

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

WILLIAM C. DOUGHERTY and)
ANARGYROS KEREAKES, individually)
and on behalf of other similarly situated)
members of the Chicago Police Department,)
)
)
Plaintiffs,) No. 15 CV 10975
)
vs.) Judge Charles P. Kocoras
)
CITY OF CHICAGO, an Illinois Municipal)
Corporation,)
)
Defendant.)

PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT

NOW COME Plaintiffs, by and through their attorneys, the Law Offices of Paul D. Geiger, and for their Motion for Summary Judgment, state as follows:

1. Plaintiffs have pending before this court a Fourth Amended Complaint consisting of three counts. Count I claims violations of the FLSA, Count II claims violations of the Illinois Wage Payment and Collection Act (IWPCA), while Count III alleges violations of the Illinois Minimum Wage Law.

2. Plaintiffs seek summary judgment on all the issue of liability for all three counts of the Fourth Amended Complaint.

WHEREFORE, the Plaintiffs respectfully request that this Honorable Court enter an order granting their Motion for Summary Judgment on all counts and setting a schedule for additional discovery to be conducted on the issue of damages.

Respectfully Submitted,

s/Paul D. Geiger

PAUL D. GEIGER

Law Offices of Paul D. Geiger
540 W. Frontage Road
Suite 3020
Northfield, Illinois 60093
(773) 410-0841